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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION AND AGREEMENT FOR
ORDER FURTHER CONTINUING
HEARING ON MOTION FOR RELIEF
FROM STAY BETWEEN THE UTILITY
AND JH KELLY, LLC**

[Relates to Dkt. Nos. 5649-5652, 5829]

Regarding Motion Set for Hearing March 25,
2020 at 10:00 a.m. PDT

1 This stipulation (the “**Stipulation and Agreement for Order**”) is entered into by and
2 between Pacific Gas and Electric Company (the “**Utility**”), as debtor and debtor in possession in
3 the above-captioned cases (the “**Chapter 11 Cases**”), and JH Kelly, LLC (“**JH Kelly**”). The
4 Utility and JH Kelly are referred to in this Stipulation and Agreement for Order collectively as
5 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

6 **RECITALS**

7 A. On February 5, 2020, JH Kelly filed the *Motion for Relief from Automatic Stay*
8 [Dkt. 5649] (the “**Motion**”), and the Notice of Hearing on the Motion [Dkt. 5650], which
9 scheduled a hearing on the Motion (the “**Hearing**”) for February 26, 2020 at 10:00 am PST.

10 B. In the Motion, JH Kelly seeks relief from the automatic stay to permit JH Kelly to
11 move to join the Utility as a party to the litigation pending in the Superior Court of the State of
12 California, County of Shasta, *JH Kelly, LLC v. AECOM Technical Services, Inc., et al.*, Case No.
13 192600.

14 C. On February 16, 2020, the Parties filed the *Stipulation and Agreement for Order*
15 *Continuing Hearing on Motion for Relief from Stay between the Utility and JH Kelly* [Docket
16 No. 5797] (the “**First Stipulation**”), in which they agreed to continue the Hearing to March 25,
17 2020. On February 19, 2020, the Court approved the First Stipulation. *See* Dkt. No. 5829.

18 D. The Parties are continuing to confer regarding a potential resolution to the
19 Motion, and desire to continue the Hearing further while they continue those discussions.

20 **NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND**
21 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
22 **JOINTLY REQUEST THE COURT TO ORDER, THAT:**

23 1. This Stipulation shall be effective upon entry of an order by this Court
24 approving it.

25 2. The March 25, 2020 Hearing shall be continued to April 7, 2020 at 10:00
26 a.m. PDT.

27 3. The time in which the Utility is permitted to respond to the Motion is
28 continued to no later than March 26, 2020.

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4. JH Kelly shall be permitted to file a reply in further support of the Motion no later than April 2, 2020.

5. This Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation and Agreement for Order or the order approving it.

Dated: March 12, 2020

Dated: March 12, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

STOEL RIVES LLP

/s/ Peter J. Benvenutti

/s/ David B. Levant

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